

United States District Court  
Southern District of Texas  
FILED

SEP 04 2012

Appendix A

David J. Bradley, Clerk of Court  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
Houston DIVISION

REGINALD J. HUNTER

versus

DEPARTMENT OF  
AGING AND  
DISABILITY SERVICES

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. \_\_\_\_\_

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

REGINALD J. HUNTER

Address:

7914 BrooksidePEARLAND, TEXAS 77581

County of Residence:

Brazoria

3. The defendant is:

DEPARTMENT OF AGING

Address:

AND DISABILITY SERVICES5425 POLK STREET, SUITE 290 Houston TX 77023

Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on Nov 16, 2011 with the Equal Opportunity Commission.

5. On the date of June 6, 2012, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☐ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff
- (d) ☒ other: Differential Treatment based on Race;  
Verbal Abuse, Management by intimidation,  
Termination Threats AND Subjected to Racist Comments

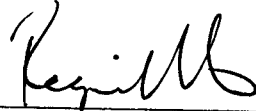
7. When and how the defendant has discriminated against the plaintiff:

First five & half years of being employed with the Department  
of Aging And Disability Services. Differential Treatment based  
Race.

8. The plaintiff requests that the defendant be ordered:

- (a) ☐ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

- (e) ☒ to Prove to the courts, that steps have been taken  
to Re-train Managers and pay 25% of the initial  
Settlement Requested in Mediation and that;
- (f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.



(Signature of Plaintiff)

Address: 7914 Brookside  
Peorland, Tx 77581

Telephone: 281-217-9906

Additional Defendant List:

**Larry Beauvais-** Residential Address

*2424 Westgate*

Houston, Texas 77098

Former Employer: Department of Aging and Disability Services

Resignation Date: January 31, 2012

Job Description: Program Manager/Life Safety Code

5425 Polk St. Houston, Texas 77023

**Samantha Gotsdiner**

Employer: Department of Aging and Disability Services

Job Description: Manager/Enforcement Coordinator

5425 Polk St. Houston, Texas 77023